

## **IN THE CLAIMS**

This listing of claims will replace all prior versions, and listings, of claims in the application:

1. (Currently amended) A method to seal between a subterranean wellbore wall and an interior tubing, comprising selectively bringing earth material of the subterranean wellbore wall inwardly towards the tubing.

2. (Original) The method of claim 1, wherein the bringing step comprises bringing the wall into sealing contact with the tubing.

3. (Currently amended) ~~The method of claim 1, wherein the bringing step comprises~~ A method to seal between a subterranean wellbore wall and an interior tubing, comprising bringing the wall inwardly towards the tubing by mechanically unloading a section of the wellbore.

4. (Original) The method of claim 3, wherein the mechanically unloading step comprises scraping a portion of the wellbore wall.

5. (Original) The method of claim 4, wherein the mechanically unloading step comprises collecting the portions to create the seal.

6. (Withdrawn) The method of claim 1, wherein the bringing step comprises hydraulically unloading a section of the wellbore.

7. (Withdrawn) The method of claim 6, wherein the hydraulically unloading step comprises providing a fluid stream at the wellbore wall with enough force to dislodge portions of the wellbore wall.

8. (Withdrawn) The method of claim 7, wherein the hydraulically unloading step comprises collecting the portions to create the seal.

9. (Withdrawn) The method of claim 6, wherein the hydraulically unloading step comprises creating a suction area proximate the wellbore wall with enough force to dislodge portions of the wellbore wall.

10. (Withdrawn) The method of claim 9, wherein the hydraulically unloading step comprises collecting the portions to create the seal.

11. (Withdrawn) The method of claim 1, wherein the bringing step comprises explosively unloading a section of the wellbore.

12. (Withdrawn) The method of claim 11, wherein the explosively unloading step comprises creating an explosion towards the wellbore wall to dislodge portions of the wellbore wall.

13. (Withdrawn) The method of claim 12, wherein the explosively unloading step comprises collecting the portions to create the seal.

14. (Withdrawn) The method of claim 1, wherein the bringing step comprises swelling a portion of the wellbore wall.

15. (Withdrawn) The method of claim 14, wherein the swelling step comprises distributing a chemical on the wellbore wall.

16. (Canceled) A method to seal between a subterranean wellbore wall and an interior tubing, comprising setting two packers against the wall and bringing the wall between the two packers inwardly towards the tubing.

17. (Canceled) The method of claim 16, wherein the bringing step comprises bringing the wall into sealing contact with the tubing.

18. (Canceled) The method of claim 16, wherein the bringing step comprises creating a suction area proximate the wellbore wall between the two packers with enough force to dislodge portions of the wellbore wall between the two packers.

19. (Currently amended) A system for sealing between a subterranean wellbore wall and an interior tubing, comprising a sealing unit adapted to move a bring the wall of earth material inwardly towards the tubing.

20. (Original) The system of claim 19, wherein the sealing unit is adapted to bring the wall into sealing contact with the tubing.

21. (Original) The system of claim 19, wherein the sealing unit comprises at least one scraper arm to scrape a portion of the wellbore wall.

22. (Original) The system of claim 21, wherein the sealing unit comprises a holder to collect the portions to create the seal.

23. (Withdrawn) The system of claim 19, wherein the sealing unit comprises a pressurized fluid source and at least one nozzle, wherein the nozzle directs fluid from the source at the wellbore wall with enough force to dislodge portions of the wellbore wall.

24. (Withdrawn) The system of claim 23, wherein the sealing unit comprises a holder to collect the portions to create the seal.

25. (Withdrawn) The system of claim 19, wherein the sealing unit comprises a suction source and at least one port on the tubing, wherein the port provides fluid communication between the source and the wellbore wall and a suction area is created proximate the wellbore wall with enough force to dislodge portions of the wellbore wall.

26. (Withdrawn) The system of claim 25, wherein the sealing unit comprises a holder to collect the portions to create the seal.

27. (Withdrawn) The system of claim 19, wherein the sealing unit comprises at least one explosive, wherein the explosive creates an explosion towards the wellbore wall to dislodge portions of the wellbore wall.

28. (Withdrawn) The system of claim 27, wherein the sealing unit comprises a holder to collect the portions to create the seal.

29. (Withdrawn) The system of claim 19, wherein the sealing unit comprises a chemical source and at least one nozzle, wherein the nozzle distributes chemical from the source on the wellbore wall to swell the wellbore wall towards the tubing.